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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
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GTE CORPORATION,)
)
Transferor,)
)
and)
)
BELL ATLANTIC CORPORATION,)
)
Transferee,)
)
For Consent to Transfer Control)

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OFFICE OF THE SECRETARY
CC Docket No. 98-10

COMMENTS OF THE AMERICAN TELEMEDICINE ASSOCIATION

March 1, 2000

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The American Telemedicine Association (ATA), a non-profit association promoting greater access to medical care via telecommunications technology, submits these comments in support of the transfer of control of GTE Corporation to Bell Atlantic Corporation.

ATA strongly believes that increased competition for local, long distance and wireless services and the development and deployment of advanced services through a competitive Internet backbone structure are of vital importance to the future delivery of quality health care. The merger of Bell Atlantic and GTE will create a company with the national presence, footprint, and technology base to deliver on its promises of out-of-region competition and advanced services deployment in un-served and under-served rural and urban areas.

I. Statement of Interest

Established in 1993, ATA is responsible for defining and working to resolve many of the major barriers to the advancement of telemedicine.

ATA promotes professional, ethical and equitable improvement in health care delivery through the application of telecommunications technology. The association implements these objectives by: promoting telemedical research and education; assisting in the development of telemedical policy and standards; educating government and industry leaders about telemedicine as an essential element in the delivery of modern medical care; providing educational materials to public and professional organizations; interacting with healthcare systems worldwide; serving as a

clearinghouse for telemedical information and services; and supporting local health care system initiatives in telemedicine, especially in medically underserved areas.

II. Increased Competition in the Marketplace

ATA believes the merger of Bell Atlantic and GTE will provide a variety of pro-competitive benefits to consumers and telecommunications users. The expanded national footprint of the merged company will enable it to compete in the areas of local, long distance, wireless and advanced services in and out of its current service regions. This ability to compete across-the-board will lead to the increased development of innovative and affordable telecommunications services and products for consumers and businesses alike.

Bell Atlantic and GTE have committed to spend “at least \$500 million (the Out-of-Region Expenditure) by the end of the 36th month after the Merger Closing Date to provide services, including resale, that compete with traditional telephone services offered by incumbent local exchange carriers or to provide Advanced Services to the mass market (“Competitive Local Service”) outside the Bell Atlantic and GTE Service Area (“Out-of-Region Markets”).¹

We are also encouraged by Bell Atlantic’s and GTE’s commitment to a “Carrier-to-Carrier Performance Plan” to ensure that they will follow through with the commitments they made as part of their Supplemental Filing. The merged company has stated that they will pay up to \$1.164 billion dollars to the United States Treasury over three years if they do not comply with the conditions stated in their filing. This

¹ Bell Atlantic and GTE Merger, CC Docket No. 98-184, Proposed Conditions for Bell Atlantic/GTE Merger, January 27, 2000, p. 39.

significant monetary pledge demonstrates their commitment and provides additional incentive that the merged company's conditions will be complied with.

Bell Atlantic and GTE have also agreed to adopt stringent performance measures for each company. As stated in their filing, Bell Atlantic will adopt the New York standards and GTE will adopt the California standards. These performance standards will ensure that there will be open competition in all markets to the benefit of all telecommunications consumers.

The members of ATA not only represent the new and exciting field of telemedicine, but as physicians and health care professionals, we are also telecommunications users (as consumers and businesses) and are keenly aware of the needs of our patients for affordable health care strategies. The merged company's commitment to compete out-of-region for telephone and advanced services will be beneficial to all telecommunications consumers.

Unlike some previous mergers, this is not a merger of two RBOCs. The complimentary assets of Bell Atlantic and GTE together will enable the merged company to deliver an array of local, long distance, wireless and advanced services across the nation. The merged company's ability to compete nationally and deliver a full package of services will in turn drive the remaining telecommunications and advanced services companies to respond. We are hopeful that such nationwide competition will drive prices down through the offering of competitive packages of services and will accelerate the development and deployment of new products and services that can be used in the delivery of telemedicine. This new competitive marketplace structure is the goal of the Telecommunications Act of 1996: providing consumers (personal and business users of

telecommunications and advanced services) with choice of products and services at affordable prices. ATA members, along with other consumer, business and institutional customers, will benefit from the results of a new major national competitor in the marketplace.

III. Advanced Services

ATA represents physicians and health care professionals that see the promise of applying telecommunications and Internet technologies to provide distance and remote health care services to rural and underserved communities. As noted in the *ASTA 1999 Report on U.S. Telemedicine Activity*, "Telecommunications services are becoming more diverse. While interactive video is still the most common means of delivering care remotely, store-and-forward, audiographic and telemetry technologies are gaining wider acceptance, and many programs deliver care using a combination of these."² The development and deployment of advanced services throughout the nation will greatly assist ATA members and telemedicine practitioners in delivering telemedicine applications to all residents – here and abroad - that do not currently have the access to expert medical services.

In his September 15, 1999 testimony before the Senate Committee on Commerce, Science and Transportation, Subcommittee on Science, Technology and Space, ATA member, LTC Ronald Poropatich, M.D. stated:

The deployment of telemedical links to rural and suburban medical centers require communications networks that are reliable and capable of handling large amounts of data in a short time. Homecare applications involving large patient data files will benefit greatly from the availability of broadband networks....The Internet is becoming the preferred platform for the delivery of telemedical services and can be an important vehicle for providing health care services to an

² Summary of the 1999 Report on U.S. Telemedicine Activity, The Association of Telemedicine Service Providers.

individual at home. It is therefore important that Congress help ensure that high-speed access to the Internet is available throughout the country including rural communities and individual homes.³

Unfortunately many rural areas of the nation do not have access to advanced high-speed services. The Inter-Exchange Carriers and other competitors have ignored the needs of rural America and many underserved urban communities, focusing instead to deploy advanced services in high-density, business-rich urban areas. The limited deployment of advanced services throughout the nation, including underserved rural and urban areas, negates and limits the true potential of telemedicine and its application for health care services in areas of the nation where it is most needed.

ATA is encouraged by Bell Atlantic's and GTE's commitment, as stated in their Supplemental Filing, to target deployment of advanced services to include low-income groups in rural and urban areas. The deployment of advanced services outside of the business-rich urban areas will significantly enhance ATA members' abilities to use the Internet and other telecommunications links to reach more people and deliver additional services with greater speed and efficacy. ATA also believes Bell Atlantic's and GTE's proposal to divest GTE-Internetworking into a separate publicly owned corporation with the option to convert upon securing long distance approval in the Bell Atlantic states will provide the added impetus for the merged company to work diligently to provide long distance services. This effort will also ensure that the local markets are opened up, bringing more competition and avenues of choice for consumers and businesses, including ATA members.

³ Testimony of LTC Ronald Poropatich, M.D., before the Senate Committee on Commerce, Science and Transportation, Subcommittee on Science, Technology and Space.

IV. Commitment to Enhanced *Lifeline* Services

ATA believes that the telephone plays a vital role in ensuring that all that live in America receive good health care. Many ATA members serve low-income persons in rural and urban settings, and the telephone plays a vital role in allowing health care professionals to communicate with their patients. ATA is encouraged by the merged company's commitment to enhance its *Lifeline* program throughout its national service area. The merged company has offered to limit the costs for *Lifeline*, offer discounts, provide information and education on the program and establish a toll-free 800 number for consumers to receive information on the enhanced *Lifeline* program. This commitment will provide additional and needed opportunities for more low-income persons to secure the use of a telephone at an affordable rate.

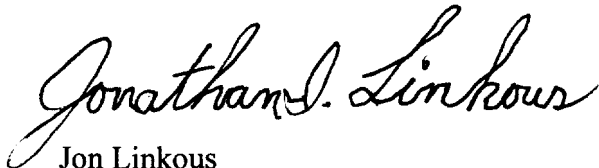
V. Conclusion

The multiple applications and uses of telemedicine must be supported by a national infrastructure capable of providing local, long distance and advanced services in all areas of the nation. ATA seeks to ensure that all that live in this nation can access and receive quality health care. To do so, it is imperative that physicians, health care professionals, institutions and related agencies receive the benefits of a full array of affordable telecommunications services.

We support this merger because we believe the merged company will have the scale and resources necessary to establish a truly national network of local, long distance, wireless and advanced services. Our support is also based on the merged company's commitment to deploy these services out of its current service regions and to deploy advanced services in underserved rural and urban areas.

A new national full service telecommunications provider is needed to promote competition and to provide alternatives of choice, access and services to all consumers. ATA urges the Commission to approve the Bell Atlantic and GTE merger with the conditions stated in their Supplemental Filing.

Respectfully submitted by,

A handwritten signature in cursive script that reads "Jonathan I. Linkous". The signature is written in black ink and is positioned above the printed name and title.

Jon Linkous
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